

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

TAMRARIN LINDENBERG, individually
and as Natural Guardian of her minor children
ZTAL and SML,

Plaintiff,

Civil Action No. 13-cv-02657

v.

JACKSON NATIONAL LIFE INSURANCE COMPANY,

Defendant.

NOTICE OF CORRECTION OF NOTICE OF REMOVAL

Comes now Defendant Jackson National Life Insurance Company (“JNLIC”) and files this Notice of Correction of its Notice of Removal [Doc No. 1] pursuant to 28 U.S.C. §§ 1332, 1441 and 1446 removing this case to the United States District Court for the Western District of Tennessee, Western Division from the Circuit Court for Shelby County, Tennessee, to correct and remove the names of the minor children of the Plaintiff as contained in the Plaintiff’s Complaint:

1. On July 19, 2013, Plaintiff filed with the Circuit Court for Shelby County, Tennessee the Complaint with exhibits¹ which is filed herewith as Exhibit 1. Other filings in said court are also included within said exhibit.

2. JNLIC was served with the Complaint and Summons on or about July 26, 2013.

3. Plaintiff’s alleged claims relate to a claim for the proceeds of the payment of a death benefit due under a life insurance policy issued by JNLIC to Thomas A. Lindenberg, hereinafter “decedent”.

¹ The exhibits to the Complaint have been redacted by JNLIC to remove identifiable information and medical history of the decedent and the names of the minor children of the Plaintiff which were contained on the pleading as previously filed.

4. Jurisdiction in this Court exists in this matter pursuant to 28 U.S.C. § 1332 as (i) Plaintiff is a resident of Shelby County, Tennessee, (ii) JNLIC is foreign corporation duly incorporated under the laws of Michigan with principal offices located at 1 Corporate Way, Lansing, Michigan 48951, and (iii) the amount in controversy exceeds \$75,000, exclusive of interest and costs.

5. This Notice of Removal is properly filed within the 30-day limit provided in 28 U.S.C. § 1446(b) in as much as it has been filed within 30 days of the service of the Complaint.

6. Notice to all adverse parties of the filing of this Notice of Removal has been given as required by 28 U.S.C. § 1446(d) and JNLIC is filing a notice of the filing of this Notice of Removal with the Circuit Court for Shelby County, Tennessee.

WHEREFORE, JNLIC gives notice of the removal of this action to the United States District Court for the Western District of Tennessee, Western Division and prays that any further proceedings in the Circuit Court for Shelby County be halted.

**BUTLER, SNOW, O'MARA, STEVENS
& CANNADA, PLLC**

/s/ R. Campbell Hillyer
R. Campbell Hillyer (22124)
Michael C. McLaren (28277)
6075 Poplar Avenue, Suite 500
Memphis, TN 38119
(901) 680-7200
(901) 680-7201 facsimile
cam.hillyer@butlersnow.com
Attorneys for Defendant

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing pleading has been served by regular US Mail and electronic mail this the 23rd day of August, 2013, upon the following:

Molly A. Glover, Esq.
Burch, Porter & Johnson, PLLC
130 North Court Avenue
Memphis, TN 38103
mglover@bpjlaw.com
Attorneys for the Plaintiff

/s/ R. Campbell Hillyer